

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

MOTIVA PATENTS, LLC,

Plaintiff,

v.

FACEBOOK TECHNOLOGIES, LLC, F/K/A
OCULUS VR, LLC

Defendant.

Civil Action No. 6:18-cv-00178-JRG-KJG

JURY TRIAL DEMANDED

**DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL DEFENDANT
FACEBOOK TECHNOLOGIES, LLC’S MOTION TO DISMISS AND/OR
TRANSFER FOR IMPROPER VENUE, OR ALTERNATIVELY,
FOR TRANSFER UNDER 28 U.S.C. § 1404(A)**

Defendant Facebook Technologies, LLC (“Facebook Tech”) respectfully requests leave to file Defendant Facebook Tech’s Motion to Dismiss and/or Transfer for Improper Venue, or Alternatively, for Transfer Under 28 U.S.C. §1404(a) and supporting papers (the “Motion”) under seal. Facebook Tech’s Motion contains information designated by Defendant Facebook Tech as Outside-Attorneys’ Eyes Only pursuant to P.R. 2-2 and Local Rule CV-5(a)(7). Plaintiff Motiva Patents, LLC is unopposed to Facebook Tech filing the Motion under seal.

Dated: November 29, 2018

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Respectfully submitted,

By: /s/ Heidi L. Keefe

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CERTIFICATE OF CONFERENCE

This is to certify that I, Eamonn Gardner, counsel for Defendant Facebook Technologies LLC, met and conferred by email with Matthew Antonelli, counsel for Plaintiff Motiva Patents LLC, on the 28th day of November, 2018 in compliance with LR cv-7(h). Counsel for Plaintiff indicated that the Motion is unopposed.

/s/ Eamonn Gardner
Eamonn Gardner

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. First Class mail on this 29th day of November, 2018.

/s/ Heidi L. Keefe

Heidi L. Keefe